

## REMARKS

Initially, Applicant appreciates the indication of allowable subject matter. Claims 1-7 and 13-15 were rejected. Applicant respectfully traverses.

The presently claimed invention is directed to a heart model that permits a medical device lead to be inserted and affixed for training and educational purposes. None of the references alone or in combination teach the claimed structure.

With respect to claim 1, the Examiner has separately cited Buboltz and Garoni. Buboltz is a design patent for a bottle. The bottle is shaped like a heart and includes (presumably) a hollow interior. It also has a top opening with a threaded member. The Examiner asserts that this is an "affixation surface that permits lead affixation." This is simply too broad and therefore an unreasonable interpretation of the claims language. It is clear from the specification and the claims that medical device leads used with implantable cardiac devices are navigated through the heart model and affixed. For example, in claim 2 a helical tip is screwed into a surface. Thus, reading the claim as a whole and in context it is clear that the screw top of the bottle is not a lead affixation surface.

Garoni teaches an electrical device that through lights demonstrates the visual pathway of electrical propagation in the heart. Again, there is no teaching that an area or surface is provided that a lead could be affixed. Once again, lead refers to well known implantable cardiac device leads when the term is fairly read in the context of the claims and specification. Affixing such a lead with e.g., a helical tip would in fact likely destroy the circuitry that is the essence of the Garoni device. Thus, the reference does teach a surface to which a lead, as used herein, may reasonably be affixed and certainly would not be modified to do so as suggested by the Examiner.

Garoni is combined with Gardeski et al. As a formal matter this rejection must be withdrawn as the reference was commonly assigned or subject to an agreement to be commonly assigned with the assignee of the present invention. As such, under 35 USC 103(c) the reference is disqualified.

Furthermore, the motivation to combine is that in so doing the result would provide for actual simulation of procedures performed on the heart. Of course, that is the purpose of the presently claimed invention but is not taught, suggested nor implied in the references cited. As such, the rejection would also be improper on this basis.

Finally, Buboltz was combined Jelicka which is a bottle that has a cap that includes a light socket and electrical wiring. Thus, the Examiner combined a bottle shaped like a heart with a bottle having a lamp to reject a claim directed to, for example, a heart model that receives a lead that can be affixed to a removable plug. Again, the term lead has a specific meaning in the present context and even if the references are combined no model is provided to receive such a lead and permit affixation. What would result is a heart shaped bottled with a lamp on top. As such, the references alone or in combination do not teach the claimed subject matter.

Applicant respectfully asserts that all pending claims are allowable and request notice of the same. Should any issues remain outstanding, the Examiner is urged to telephone the undersigned to expedite prosecution.

Respectfully submitted,

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